

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327
THIS DOCUMENT RELATES TO: Ethicon Wave 1 cases listed in Exhibit A	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**PLAINTIFFS' MOTION TO EXCLUDE CERTAIN OPINIONS
AND TESTIMONY OF DOUGLAS GRIER, MD**

Plaintiffs respectfully request that the Court preclude defense expert Douglas Grier, M.D., from giving opinions on (1) the design of Defendants' transvaginal mesh products at issue, including the safety and efficacy of those devices; (2) his statements about the safety and efficacy of Defendants' products based on his own practice; and (3) the adequacy of Defendants' product warnings and instructions for use. The basis for Plaintiffs' motion is more fully set out in the accompanying Memorandum.

Dated: April 21, 2016

Respectfully submitted,

/s/ Thomas P. Cartmell

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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document on April 21, 2016, using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/Thomas P. Cartmell

Attorney for Plaintiffs

INDEX OF EXHIBITS

Exhibit A: List of cases on which Dr. Grier is designated

Exhibit B: Grier Prolift Report

Exhibit C: Grier Prolene Soft Report

Exhibit D: Grier TVT/TVT-O Report

Exhibit E: Grier TVT-S Report

Exhibit F: Grier Deposition, March 22, 2016

Exhibit G: Katrin Elbert Deposition, Dec. 23, 2014

Exhibit H: Charlotte Owens Deposition, Sept. 13, 2012